



March 31, 2014

Ms. Marlene Dortch

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Expression of Interest Letter – WC Docket 10-90, Connect America Fund

Dear Ms. Dortch,

This letter is submitted to express interest in participating in the Rural Broadband Experiments. Wiggins Telephone Association (WTA) is an incumbent Rate of Return local exchange carrier ("RoR LEC") providing service to rural consumers in northeast Colorado since 1952 with an average customer density of 0.7 customers per square mile. WTA recently completed a replacement of its legacy copper wire network with Fiber to the Premises and now provides broadband services to its customers with a penetration rate of over 75%. This accomplishment proves that WTA has the experience and dedication to rural consumers needed to successfully deploy broadband in rural high-cost areas.

WTA partnered with nine other independent telephone companies and Zayo Bandwidth to form Colorado Communications Transport, LLC to create a 746 mile fiber optics ring for middle mile backhaul to its members from national Internet providers in downtown Denver, Colorado.

Broadband networks, particularly high-speed broadband networks, are expensive to build and cost recovery typically requires multiple years in rural high-cost areas. WTA is very interested in partnering with the FCC to discover and implement innovative ways of deploying high-speed, scalable, IP-based networks in rural high-cost areas in northeast Colorado. WTA realizes the value and economic benefits of high-speed broadband network to be available to local schools and other anchor institutions to ensure rural economic development and opportunity for all Americans. To that end, WTA will take all steps to ensure maximum accessibility for all anchor institutions in the proposed areas.

Location of Potential Experiments

WTA is interested in providing service to eligible locations in Census Tracts located the geographic area of Morgan County, Colorado. According to the FCC's release of potentially eligible Tracts, there are approximately 933 locations, categorized as eligible as high cost and extremely high cost. These areas may include anchor institutions such as public safety organizations which would benefit from the experiment.

Census Tract ID	Estimated Number of Locations
08087000100	460
08087000200	12
08087000300	49
08087000600	6
08087000700	12
08087000800	394

Broadband Technology

Based on the funding levels available, WTA proposes to deploy Fiber to the Premises to provide a broadband capable network in the Census Tracts listed above.

Service Offerings

Consistent with the adequacy of support funds, the IP network as described above would be capable of supporting voice and high-speed broadband of at least 4 Mbps downstream and 1 Mbps upstream , with the goal of matching WTA's current broadband service offerings of up to 100 Mbps downstream and 50 Mbps upstream.

Since the proposed Census Tract locations are located in areas served by CenturyLink or other wireless providers, WTA will provide services through its wholly owned subsidiary, Northern Colorado Communications, LLC (NCC). NCC already has attained Eligible Telecommunications Certification/Eligible Provider (ETC/EP) status and is a Competitive Local Exchange Carrier in the State of Colorado. NCC has an approved local exchange tariff and Inter-Connection Agreement with CenturyLink on file at the Colorado Public Utilities Commission.

While the exact pricing for services would need to be determined by WTA/NCC, they likely would be similar to current existing WTA customers.

Existing Providers

As noted above, the proposed experiment areas may be served by CenturyLink or other wireless providers; however, the broadband services (where available) are limited in speed and reliability. The presently available broadband appears to be less than that championed by the FCC and substandard to the broadband services that could be available within the network that WTA proposes to deploy. It is, therefore, in the public interest for the FCC to deviate from its general policy of not supporting two or more providers in an area.

State or Local Government Participation and/or Partnerships

WTA has fostered positive working relationships with government entities across the broad spectrum of agencies, including municipalities, county and state offices and Federal land managers. Therefore, it foresees no insurmountable obstacle to facilities construction, concerning permitting, environmental and rights of way.

Funding

Because the unserved high-cost census blocks within the selected Census Tracts have yet to be identified, WTA is unable to fully estimate the construction costs and amount of funding needed. Final costs will be identified if and when a formal proposal is submitted. However, judging from recent projections for construction projects similar in location and size, WTA would estimate this experiment could require one-time funding of \$6,600,000.

Wiggins Telephone Association appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned with any questions.

Sincerely,



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